

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MATTHEW P. BYRNE, Administrator
of the Estate of Eileen M. Byrne,

Plaintiff,

v.

VOLVO CARS OF NORTH AMERICA, LLC,
VOLVO CAR CORPORATION and FORD
MOTOR CORPORATION,

Defendants.

CIVIL ACTION NO. 05-10861-NMG

JOINT RULE 16.1 STATEMENT

Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 16.1(B) and (D), Plaintiff Matthew P. Byrne, Administrator of the Estate of Eileen M. Byrne ("Byrne") and Defendants Volvo Cars of North America, LLC ("VCNA"), Volvo Car Corporation ("VCC") and Ford Motor Corporation ("Ford")(collectively, "Defendants"), submit this Joint Statement:

I. Agenda for July 14, 2004 Scheduling Conference:

The parties propose that the agenda for the initial scheduling conference include a discussion of the following issues:

1. Initial Exchange of Information;
2. Proposed discovery plan and protective order(s);
3. Proposed schedule for filing of motions; and
4. Proposed trial date.

II. Proposed Pretrial Schedule

1. Rule 26(a) disclosures shall be exchanged by August 15, 2005.
2. All fact discovery shall be completed by March 1, 2006.
3. The plaintiffs shall disclose any expert witnesses and reports by April 1, 2006.
4. Defendants shall disclose any expert witnesses and reports by May 1, 2006.
5. All expert discovery shall be completed by August 1, 2006.
6. Any motions for summary judgment shall be filed by September 1, 2006.
7. The final pretrial conference shall be held during November, 2006.
8. The trial of this matter shall take place in February of 2007.

The parties reserve the right to modify these dates with the Court's approval as needed based on issues that may arise during discovery.

III. Settlement

The parties have conferred regarding the issue of settlement. They currently remain unable to reach agreement.

IV. Consent To Trial By Magistrate Judge

The parties do not consent to trial by Magistrate Judge at this time.

V. Local Rule 16.1(D)(3) Certifications

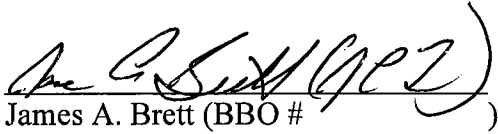
The parties shall filed Local Rule 16.1(D)(3) certifications separately.

MATTHEW P. BYRNE, Administrator
of the Estate of Eileen M. Byrne,

VOLVO CARS OF NORTH AMERICA,
VOLVO CAR CORPORATION, and
FORD MOTOR CORPORATION,

By its Attorneys,

By its Attorneys,



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Dated: July 14, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney(s)
of record for each party by facsimile.

Date: July 14, 2005

